

**REMARKS**

The Examiner rejected claims 1-16 under 35 U.S.C. §102(e) as allegedly being anticipated by Bohr (US Patent No. 6,617,681).

Applicants respectfully traverse the §102(e) rejections with the following arguments.

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35 U.S.C. §102(e)

The Examiner rejected claims 1-16 under 35 U.S.C. §102(e) as allegedly being anticipated by Bohr (US Patent No. 6,617,681).

The Examiner argues: "With regard to Claim 1, Bohr teaches a predefined block of functional circuitry (140) having a plurality of I/O pins (118) and a backside I/O pad electrically connected to each I/O pin through a backside via (122) of an integrated circuit. See figures 4 and 6."

Applicants respectfully contend that Bohr does not anticipate claim 1, because FIGS. 4 and 6 of Bohr do not disclose "a backside I/O pad electrically connected to each I/O pin through a backside via of the **integrated circuit**" (emphasis added). Thus, claim 1 requires an integrated circuit. Applicants submit that FIGS. 4 and 6 of Bohr do not depict an integrated circuit, but instead depict an interposer that couples an integrated circuit to a circuit board as shown in the abstract, the claims, and the detailed description of Bohr. In particular, FIG. 1 of Bohr shows an interposer 104 connecting integrated circuit die 102 to printed circuit board 108 (see also Bohr, col. 5, lines 41-53). FIG. 2 of Bohr shows a prior art interposer, whereas FIGS. 3-6 of Bohr each show a distinct embodiment of the interposer in accordance with Bohr's invention. Bohr makes it clear that the interposer has a chip-side adapted to be coupled to an integrated circuit chip and a backside adapted to be connected to a circuit board (see Bohr, col. 6, lines 10-15). In addition to being described functionally by Bohr as an interposer and not an integrated circuit, Applicants maintain that the interposers of FIGS. 4 and 6 of Bohr are not capable of being used as an integrated circuit because said interposers have no conductive contacts that would enable the interposer to be connected directly to a power supply. The only exterior conductive interfaces

comprised by the interposer are solder balls on the frontside for connection to an integrated circuit chip and solder balls on the backside for connection to a circuit board. The only manner in which the devices in FIG. 6 of Bohr can receive power is through their connections to the integrated circuit and/or circuit board inasmuch as the integrated circuit and/or circuit board may be coupled to a power supply. Since the interposers of FIGS. 4 and 6 cannot be directly connected to a power supply, the interposer cannot function as an integrated circuit as is known in the art.

Applicants additionally note that FIGS. 4 and 6 of Bohr do not disclose "a backside I/O pad electrically connected to each I/O pin through a backside via of the integrated circuit". Although the Examiner alleges that Bohr teaches a backside I/O pad in FIGS. 4 and/or FIG. 6 of Bohr, Applicants maintain that Bohr does not disclose a backside I/O pad in either FIG. 4 or FIG. 6 and Bohr does not disclose backside I/O pad in the description of FIGS. 4 and 6. Moreover, the Examiner has not provided any argument to support the Examiner's allegation that Bohr teaches a backside I/O pad.

In addition, Applicants respectfully contend that the Examiner has improperly combined FIGS. 4 and 6 of Bohr, inasmuch as FIGS. 4 and 6 represent two distinct embodiments and are not disclosed by Bohr as combinable. In effect FIGS. 4 and 6 of Bohr are two distinct references which cannot be combined in a rejection under 35 U.S.C. §102(e).

Based on the preceding arguments, Applicants respectfully maintain that Bohr does not anticipate claim 1, and that claim 1 is in condition for allowance. Since claims 2-10 depend from claim 1, Applicants contend that claims 2-10 are likewise in condition for allowance.

As to claim 11, the Examiner used the same arguments in rejecting claim 11 as were used in rejecting claim 1. In response, Applicants respectfully contend that Bohr does not anticipate claim 11 based on the same arguments stated *supra* as to why Bohr does not anticipate claim 1.

Based on the preceding arguments, Applicants respectfully maintain that Bohr does not anticipate claim 11, and that claim 11 is in condition for allowance. Since claims 12-16 depend from claim 11, Applicants contend that claims 12-16 are likewise in condition for allowance.

**CONCLUSION**

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below.

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